

# EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

CHILDREN’S HEALTH DEFENSE, )  
ROBERT F. KENNEDY, JR., TRIALSITE, )  
INC., CREATIVE DESTRUCTION )  
MEDIA, LLC, ERIN ELIZABETH FINN, )  
JIM HOFT, DR. BEN TAPPER, BEN )  
SWANN, DR. JOSEPH MERCOLA, TY )  
BOLLINGER & CHARLENE )  
BOLLINGER, )

*Plaintiffs,*

v.

WP COMPANY LLC D/B/A THE )  
WASHINGTON POST, THE BRITISH )  
BROADCASTING CORP., THE )  
ASSOCIATED PRESS, & REUTERS, )

*Defendants.*

Civil Action No. 2:23-cv-00004-Z

**DECLARATION OF CAMERON BARR**

I, CAMERON BARR, first being duly sworn, declare as follows:

1. I submit this declaration in support of Defendants’ Motion to Transfer in the above-captioned matter. I have personal knowledge of the facts set forth herein.
2. I am Senior Managing Editor of the Washington Post (“the Post”).
3. The Post’s principal place of business and the location of the substantial majority of its employees is at its headquarters located at 1301 K St. NW, Washington, D.C. 20071.
4. The Post also has an office in New York, NY.
5. I am familiar with the Trusted News Initiative (“TNI”), which was an initiative organized by the British Broadcasting Corporation (“BBC”) with a goal of improving trust in news.

The BBC invited the Post and other news organizations and companies from around the world to participate in occasional meetings.

6. The Post's involvement in the Trusted News Initiative ("TNI") was limited. From the time the Post was initially approached about the TNI in 2020, the Post has had only two liaisons to the TNI.

7. The Post's first liaison to the TNI's occasional meetings was former Post Director of News Product Greg Barber. Mr. Barber worked out of the Post's office in Washington, D.C. To the best of my knowledge, to the extent Mr. Barber attended the TNI meetings, he did so virtually from in or near Washington, D.C.

8. In late March 2021, the TNI hosted a Trust in News virtual conference. I participated as a panelist in a session entitled "The Threat to Democracy." I attended this panel virtually from Washington, D.C. This was my only involvement in any TNI event or meeting.

9. Mr. Barber left the Post in October 2021. He continues to reside in the Washington, D.C. region, in Arlington, Virginia.

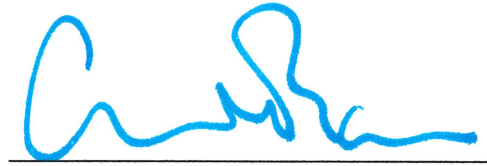
10. Sometime after Mr. Barber's departure, politics editor Peter Wallsten assumed the role as the Post's liaison to the TNI. Mr. Wallsten works out of the Post's office in Washington, D.C. To the best of my knowledge, to the extent Mr. Wallsten attended the TNI meetings, he did so virtually from Washington, D.C. My understanding is that Mr. Wallsten did not attend more than a few meetings total, and that the Post otherwise had no representative at the TNI meetings.

11. To the best of my knowledge, any documents related to the Post's involvement in the TNI would be held at the Post's Washington, D.C. office.

12. In sum, the three most knowledgeable witnesses regarding the Post's participation in the TNI, and any related documentary evidence, are all located in or near Washington, D.C.

13. To the best of my knowledge, the Post has conducted no activities relating to the TNI in Texas, and no Post employee conducted any TNI activities from Texas.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this Declaration was executed on April 18, 2023.

A handwritten signature in blue ink, appearing to read 'C. Barr', is written above a horizontal line.

CAMERON BARR